

**MEMO ENDORSED**

**GOTTLIEB & ASSOCIATES PLLC**  
**ATTORNEYS**

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May 8, 2024

**VIA ECF**

The Honorable Ona T. Wang  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *Thorne v. Ring LLC*,  
Case No.: 1:24-cv-2287

Dear Judge Wang,

The undersigned represents Braulio Thorne, on behalf of himself and all other persons similarly situated ("Plaintiff") in the above referenced matter against Defendant, Ring LLC, ("Defendant"). The undersigned respectfully requests that the Initial Conference scheduled for May 14, 2024, at 11:00 AM (Dkt. 8) be adjourned for 60 days because the Defendant is still in the process of being served and their counsel has not yet answered or appeared in this action. This request will grant ample time for service to be effectuated and for the Defendant to appear and discuss a possible resolution with Plaintiff's Counsel. This is the Plaintiff's first request for an extension.

Respectfully submitted,

GOTTLIEB & ASSOCIATES PLLC

/s/Michael A. LaBollita, Esq.  
Michael A. LaBollita, Esq.

**SO ORDERED:**

Application **GRANTED**.  
The May 14, 2024 conference is adjourned to  
**July 9, 2024 at 11:00 a.m.**



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**Ona T. Wang** 5/9/24  
United States Magistrate Judge